



State of New Jersey
Department of Environmental Protection and Energy
Division of Responsible Party Site Remediation
CN 028
Trenton, NJ 08625-0028

Scott A. Weiner
Commissioner

Karl J. Delaney
Director

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

SEP 10 1992

Edward A. Hogan, Esq.
Porzio, Bromberg & Newman
163 Madison Avenue
Morristown, NJ 07960

Re: Hexcel Corporation (Hexcel)
Lodi Borough, Bergen County
ECRA Case # 86009

Dear Mr. Hogan:

This is in response to the reports up to and including the July 15, 1992 Progress Report submitted by Heritage Remediation/Engineering, Inc. on behalf of Hexcel Corporation for the above referenced site.

The New Jersey Department of Environmental Protection and Energy (NJDEPE) has reviewed these reports and has the following comments. Hexcel shall submit the information in items II. and III.A. below to this office along with the written progress report due on or before October 15, 1992. Hexcel shall submit the information in item I. below to this office along with the written progress report due on or before November 15, 1992.

Please be advised the proposed cleanup standard rules appeared in the February 3, 1992 New Jersey Register. These shall be used as guidance to determine: what concentration of contaminants need to be present at a site to consider the site contaminated; which areas of environmental concern need additional investigation; and the concentration of a contaminant allowed to remain for a site to be considered "clean".

When the person responsible for conducting a cleanup agrees to remediate a contaminated site consistent with the proposed cleanup standards, no further discussion on the identification of cleanup standards will be necessary. It must be remembered, however, that upon adoption, or at any time thereafter, if the cleanup standard for a given contaminant is revised, then remediation to achieve that adopted cleanup standard may be required.

If the person responsible for conducting a cleanup does not agree to remediate a contaminated site consistent with the proposed cleanup standards, then the NJDEPE cannot require compliance with the proposed standards at this time. In these circumstances, the responsible party shall submit a proposal to the NJDEPE that details the site specific circumstances and technical rationale for proposed cleanup goals on a case-by-case basis.



I. SOILS

Hexcel is considered to be located in a potable use ground water area (Class IIA). The borough of Lodi does not qualify for a non-potable ground water use area pursuant to the proposed Ground Water Standards N.J.A.C. 7:9-6.5(e)2 because the majority of the borough's population relies on ground water withdrawn from within the borough for potable supply. Therefore, Hexcel shall apply the subsurface soil standards which are protective of ground water when evaluating the soils at this site.

As discussed in the August 27, 1992 meeting between representatives of the NJDEPE and Killman Associates, Hexcel shall submit a detailed proposal for the remediation of any contamination at this site. Because ECRA applicable industrial operations are continuing, Hexcel shall apply either the non-residential surface levels or the subsurface soil cleanup levels, whichever are more stringent, at this site.

Hexcel shall review all past and present areas of concern identified by the NJDEPE from the initiation of this ECRA case and compare the results with the proposed cleanup standards. All areas of concern are to be reviewed regardless of whether or not "no further action" was originally approved. Hexcel shall submit the sample results in tabular format by area of concern, indicating sample depths and the minimum detection limits along with a scaled site map indicating sample locations. Hexcel shall submit this information along with the proposal for remediation to this office. In addition, Hexcel shall address the remediation of any interior areas of concern in the proposal.

Properties that meet the non-residential soil standards are appropriate for industrial reuse only. The non-residential surface cleanup levels are intended to be protective of human health for the direct contact exposure pathways in a non-residential setting.

When the non-residential surface cleanup level is more stringent than the subsurface cleanup level, at a minimum, the top two feet of soil column shall be remediated to the applicable non-residential surface cleanup level. When ECRA applicable, industrial operations are continuing and the top two feet have been remediated to non-residential standards and the appropriate subsurface standards have been met throughout the soil column, no further remedial actions or institutional controls will be required at that time. It is recognized that contaminant levels above the current NJDEPE guidance levels will exist at this location after remediation. Records relative to these contaminants and the corresponding site locations will be available for review within the ECRA case file.

Please be advised that additional remedial measures such as contaminant removal, and/or institutional controls will be required upon cessation of the continuing ECRA operations. Hexcel will be required to provide documentation that the current property owner/operator accepts any contamination above the proposed residential cleanup standards remaining on-site.

When a cessation of operations of ECRA applicable operations occurs, the site must be evaluated based on the residential cleanup standards. At a minimum, contaminant levels remaining throughout the soil column must be protective for the future site use and any necessary institutional controls, where levels exceed the applicable residential surface soil standards, will be required.

When the subsurface cleanup level, which are intended to be protective of ground water, is more stringent than the surface cleanup level, the entire soil column shall be remediated to the applicable subsurface cleanup level. Remediation of the entire soil column to the more stringent subsurface cleanup levels ensures continued degradation of ground water above the applicable ground water cleanup levels does not occur.

For all sites, regardless of the site location or site use soil contaminant levels must be remediated to a level below 1000 ppm total volatile organic contaminants (TVO) and 10,000 ppm total organic contaminants (TOC) throughout the soil column.

Compliance with the soil levels is evaluated by the NJDEPE using the criteria outlined in the proposed Cleanup Standards, with the exception of 1,000 ppm TVO's and 10,000 ppm TOC, which no samples shall exceed. All future data submissions for soils should be evaluated using the NJDEPE's latest evaluation criteria.

II. GROUND WATER

As discussed in the August 27, 1992 meeting, Hexcel shall submit a ground water report to this office. At a minimum, the report shall detail the status and proposals for the following ground water issues: the monitoring program for the evaluation of the effectiveness of the shallow overburden remedial system; the DNAPL and LNAPL monitoring programs and the off-site receptor investigation report. In addition, the report shall include the results of the packer test recently completed and the status of all permits and the PVSC acceptance of the discharge of treated ground water.

The NJDEPE is currently evaluating ground water cleanup numbers for this site that are protective of both the ground water quality and the adjacent Saddle River. It is possible that the ground water cleanup numbers generated for this site may be more stringent for certain compounds than the proposed Class IIA ground water standards.

III. GENERAL COMMENTS

A. Hexcel shall submit a revised time schedule to this office. The schedule shall indicate the timeframes for the initiation and completion of all remedial activities, both soils and ground water, at the site. The schedule shall indicate the date for submission of the final report.

B. Please be advised the proposed "Technical Requirements for Site Remediation" rules appeared in the May 4, 1992 New Jersey Register. These proposed rules provide guidance concerning the environmental investigation and remediation at contaminated sites or sites at which contamination is suspected. Prior to promulgation, these proposed rules will be used as the NJDEPE's primary guidance document, replacing the Division of Responsible Party Site Remediation's Remedial Investigation Guide, the ECRA Cleanup Plan Guide, parts of the Bureau of Underground Storage Tank's (BUST) Scope of Work document (and appendices) and the BUST Technical Guidance Document.

C. Hexcel shall perform all sampling procedures in accordance with the protocol outlined in the May 1992 edition of the "NJDEPE Field Sampling Procedures Manual".

D. Hexcel shall notify the case manager at least 14 calendar prior to the initiation of any remedial activities so that a representative from the NJDEPE may be present.

If you have any questions regarding this letter, please contact the Case Manager, Kathleen Miiller, at (609) 633-7141.

Sincerely,

Carolyn K. Scott, for

Tessie W. Fields, Section Chief
Bureau of Environmental Evaluation and
Cleanup Responsibility Assessment

c: Michael McCann, BEERA
Beverly Phillips, BGWDC
William Nosil, Hexcel Corporation
William Hoehlein, Killman Associates
James Higdon, FOA Corporation